

1 KEVIN V. RYAN (CSBN 118321)  
United States Attorney

ORIGINAL  
FILED

JUN 24 2004

RICHARD W. WIERING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 OAKLAND DIVISION

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12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

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16 VERONICA A. KEITH,  
aka VERONICA A. PARKER,

17 Defendant.  
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No. **CRO4-40105 WDB**

VIOLATION: 29 U.S.C. §439(c)-False Entry  
in or Willful Concealment of Books and  
Records (Class A misdemeanor)

OAKLAND VENUE

19 INFORMATION

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21 The United States Attorney charges:

22  
23 **COUNTS ONE THROUGH SEVEN:** (False Entry in or Willful Concealment of Books and  
Records - 29 U.S.C. §439 (Class A misdemeanor))

24  
25 On or about the dates listed below, in the Northern District of California, the defendant,  
26 **VERONICA A. KEITH,**  
27 did willfully falsify, conceal, withhold and destroy, a disbursement memorandum, a record  
28 required to be kept under Title 29, United States Code, Section 436, in violation of Title 29,

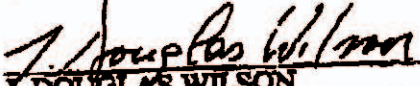
1 United States Code, Section 439(c), a Class A misdemeanor.

2 <u>Count</u>	<u>Dates</u>	<u>Unauthorized amounts to be disbursed</u>
3 One	November 15, 2000	\$491.78
4 Two	December 13, 2000	\$447.89
5 Three	December 20, 2000	\$491.78
6 Four	December 27, 2000	\$491.78
7 Five	January 3, 2001	\$491.78
8 Six	January 10, 2001	\$493.55
9 Seven	January 17, 2001	\$493.55

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DATED: 6/24/04

KEVIN V. RYAN  
United States Attorney

  
DOUGLAS WILSON  
Assistant United States Attorney